

Counsel for the State Bar THE STATE BAR OF CALIFORNIA OFFICE OF THE CHIEF TRIAL COUNSEL, ENFORCEMENT CHARLES A. MURRAY, No. 146069 1149 SOUTH HILL STREET LOS ANGELES, CA 90015	Case Number(s) 00-0-10746 00-0-14654 01-0-01709 02-0-15397 (INV) FILED OCT 31 2007 STATE BAR COURT CLERK'S OFFICE LOS ANGELES PUBLIC MATTER	(for Court use) LODGED NOV 20 2003 STATE BAR COURT CLERK'S OFFICE LOS ANGELES
TELEPHONE: (213) 765-1000 Counsel for Respondent EDWARD O'LEAR, No. 132699 CENTURY LAW GROUP 5200 W. CENTURY BLVD., #940 LOS ANGELES, CA 90045 (310) 642-6900	Submitted to Pilot Program Judge STIPULATION RE FACTS AND CONCLUSIONS OF LAW <input type="checkbox"/> PREVIOUS STIPULATION REJECTED 	
In the Matter of MARK MITCHELL GEYER Bar # 64122 A Member of the State Bar of California (Respondent)		

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted June 27, 1975
 (Date)
- (2) The parties agree to be bound by the factual stipulations contained herein even if conclusions of law or disposition (to be attached separately) are rejected or changed by the Supreme Court. However, if Respondent is not accepted into the Lawyer Assistance Program, this stipulation will be rejected and will not be binding on Respondent or the State Bar.
- (3) All investigations or proceedings listed by case number in the caption of this stipulation are entirely resolved by this stipulation and are deemed consolidated. Dismissed charge(s)/count(s) are listed under "Dismissals." This stipulation consists of 18 pages.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts".
- (5) Conclusions of law, drawn from and specifically referring to the facts, are also included under "Conclusions of Law."
- (6) No more than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any pending investigation/proceeding not resolved by this stipulation, except for criminal investigations.
- (7) Payment of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§ 6086.10 & 6140.7 and will pay timely any disciplinary costs imposed in this proceeding.

Note: All information required by this form and any additional information which cannot be provided in the space provided, shall be set forth in the text component (attachment) of this stipulation under specific headings, i.e., "Facts", "Dismissals", "Conclusions of Law."

B. Aggravating Circumstances (Standards for Attorney Sanctions for Professional Misconduct, standard 1.2(b).) Facts supporting aggravating circumstances are required.

(1) Prior Record of Discipline [see standard 1.2(f)]

(a) State Bar Court Case # of prior case 96-0-01751, 96-0-07884

(b) Date prior discipline effective October 8, 1998

(c) Rules of Professional Conduct/State Bar Action violations
Rules of Professional Conduct Code 4-100(B)(3)
Business and Professions Code 6103

(d) Degree of prior discipline No actual, 30 days stayed, 1 year probation

(e) If Respondent has two or more incidents of prior discipline, use space provided below or under "Prior Discipline" See attached page 16

(2) Dishonesty: Respondent's misconduct was surrounded by or followed by bad faith, dishonesty, concealment, overreaching or other violations of the State Bar Act or Rules of Professional Conduct.

(3) Trust violation: Trust funds or property were involved and Respondent refused or was unable to account to the client or person who was the object of the misconduct for improper conduct toward said funds or property.

(4) Harm: Respondent's misconduct harmed significantly a client, the public or the administration of justice. See attached page 16.

(5) Indifference: Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.

(6) Lack of Cooperation: Respondent displayed a lack of candor and cooperation to the victims of his/her misconduct or the State Bar during disciplinary investigation or proceedings.

(7) Multiple/Pattern of Misconduct: Respondent's current misconduct evidences multiple acts of ~~wrong doing or demonstrates a pattern of~~ misconduct.

(8) No aggravating circumstances are involved.

Additional aggravating circumstances:

C. Mitigating Circumstances [sic. Rule 1.2(e)]. Facts supporting mitigating circumstances are required.

- (1) No Prior Discipline: Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not deemed serious.
- (2) No Harm: Respondent did not harm the client or person who was the object of the misconduct.
- (3) Candor/Cooperation: Respondent displayed spontaneous candor and cooperation to the victims of his/her misconduct and to the State Bar during disciplinary investigation and proceedings.
- (4) Remorse: Respondent promptly took objective steps spontaneously demonstrating remorse and recognition of the wrongdoing, which steps were designed to timely atone for any consequences of his/her misconduct.
- (5) Restitution: Respondent paid \$ _____ on _____ in restitution to _____ without the threat of force of disciplinary, civil or criminal proceedings.
- (6) Delay: These disciplinary proceedings were excessively delayed. The delay is not attributable to Respondent and the delay prejudiced him/her.
- (7) Good Faith: Respondent acted in good faith.
- (8) Emotional/Physical Difficulties: At the time of the stipulated act or acts of professional misconduct Respondent suffered extreme emotional difficulties or physical disabilities which expert testimony would establish were directly responsible for the misconduct. The difficulties or disabilities were not the product of any illegal conduct by the member, such as illegal drugs or substance abuse, and Respondent no longer suffers from such difficulties or disabilities.
- (9) Severe Financial Stress: At the time of the misconduct, Respondent suffered from severe financial stress which resulted from circumstances not reasonably foreseeable or which were beyond his/her control and which were directly responsible for the misconduct.
- (10) Family Problems: At the time of the misconduct, Respondent suffered extreme difficulties in his/her personal life which were other than emotional or physical in nature.
- (11) Good Character: Respondent's good character is attested to by a wide range of references in the legal and general communities who are aware of the full extent of his/her misconduct.
- (12) Rehabilitation: Considerable time has passed since the acts of professional misconduct occurred followed by convincing proof of subsequent rehabilitation.
- (13) No mitigating circumstances are involved.

Additional mitigating circumstances:

See attached page 16.

ATTACHMENT TO
STIPULATION RE FACTS AND CONCLUSIONS OF LAW

IN THE MATTER OF: MARK MITCHELL GEYER

CASE NUMBER(S): 00-O-10746; 00-O-14654; 01-O-01709; 02-O-15397(INV)

DISMISSALS:

Case No. 00-O-10746

Count Four-Business & Professions Code, section 6068(k)
Count Five-Business & Professions Code, section 6068(k)

Case No. 00-O-14654

Count Three-Business & Professions Code, section 6068(m)
Count Four-Business & Professions Code, section 6106
Count Five, Rules of Procedure, rule 3-700(A)(2)

Case No. 01-O-01709

Count Three-Rules of Procedure, rule 3-700(A)(2)

PENDING PROCEEDINGS.

The disclosure date referred to, on page one, paragraph A.(6), was September 6, 2003.

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that he/she is culpable of violations of the specified statutes and/or Rules of Professional Conduct.

Case No. 00-O-10746

FACTS

JURISDICTION

1. MARK MITCHELL GEYER ("Respondent") was admitted to the practice of law in the State of California on June 27, 1975, was a member at all times pertinent to these charges, and is currently a member of the State Bar of California.

GENERAL BACKGROUND

2. On or about April 21, 1998, Respondent entered into a Stipulation Re Facts, Conclusions of Law and Disposition "(Stipulation)" with the State Bar in Case Numbers 96-O-01751 and 96-O-07884.

3. On or about April 24, 1998, the Hearing Department of the State Bar Court filed an order approving the Stipulation ("State Bar Court Order"). On or about April 24, 1998, the State Bar Court properly served upon Respondent the State Bar Court Order, together with a copy of the fully executed Stipulation.

4. On or about May 27, 1998, the State Bar Court filed a Modification Order, which it properly served on Respondent on or about May 27, 1998.

5. On or about September 8, 1998, the California Supreme Court filed an Order in Case No. S071362 ("Supreme Court Order"), ordering that Respondent be suspended from the practice of law for a period of 30 days, that execution of suspension be stayed, and that Respondent be placed on probation for a period of one year subject to the conditions of probation recommended by the State Bar Court in its order approving the Stipulation filed on or about April 24, 1998, as modified by its order filed on or about May 27, 1998.

6. The Supreme Court Order became effective on or about October 8, 1998, 30 days after the filing of the Order.

7. Pursuant to the Supreme Court Order, Respondent was ordered to comply with the following terms and conditions of probation, among others:

- a. Comply with the provisions of the State Bar Act and Rules of Professional Conduct of the State Bar of California during the period of probation;
- b. Submit to the Probation Unit, Office of the Chief Trial Counsel, State Bar of California, Los Angeles (hereinafter, "Probation Unit"), written quarterly reports each January 10, April 10, July 10, and October 10 of each year or part thereof during the period of probation, declaring under penalty of perjury that he has complied with all provisions of the State Bar Act and the Rules of Professional Conduct during the preceding calendar quarter or part thereof covered by the report and submit a final report no earlier than twenty days prior to the expiration of probation and no later than the last day of probation;
- c. Attend State Bar Ethics School and pass the test given at the end of such session, within one year of the effective date of the Supreme Court Order;
- d. Take and pass the Multistate Professional Responsibility Examination ("MPRE") and provide proof of passage to the Probation Unit within one year of the effective date of the Supreme Court Order; and
- e. Attend four hours of California Minimum Continuing Legal Education ("MCLE") approved courses in law office management, attorney-client relations, and/or general legal ethics which must be approved in advance by the Probation Unit and provide satisfactory evidence of attendance to the Probation Unit, within one year of the effective date of the Supreme Court Order.

8. Respondent failed to timely file his first two quarterly reports that were due by January 10, 1999 and April 10, 1999, respectively.

9. By letter dated on or about June 2, 1999 to Respondent, Lydia G. Dineros, Probation Deputy, Probation Unit, reminded Respondent of the terms and conditions of his suspension and probation imposed pursuant to the Supreme Court Order. Ms. Dineros reminded Respondent of his obligation to file quarterly probation reports, complete State Bar Ethics School by October 8, 1999, take and pass the MPRE by October 8, 1999, and complete four hours of MCLE approved courses in law office management, attorney-client relations, and/or general legal ethics by October 8, 1999. Ms. Dineros also reminded Respondent that his quarterly reports due by January 10, 1999 and April 10, 1999, respectively, were overdue.

10. In her June 2, 1999 letter, Ms. Dineros also reminded Respondent that failure to timely comply with the terms and conditions of probation could result in a referral for noncompliance to the Review Department of the State Bar Court or the Enforcement Unit of the Office of the Chief Trial Counsel.

11. Enclosed with Ms. Dineros's June 2, 1999 letter to Respondent were, among other things, copies of the Supreme Court Order, those portions of the Stipulation setting forth the conditions of Respondent's probation, a Quarterly Report form and instruction sheet, and the Multistate Professional Responsibility Examination schedule for the remainder of 1999. Ms. Dineros also provided Respondent with the telephone number to call to obtain information regarding Ethics School.

12. On or about June 2, 1999, Ms. Dineros's June 2, 1999 letter and the attachments thereto were mailed to Respondent via the United States Postal Service, first class postage prepaid, in a sealed envelope addressed to Respondent at his official State Bar membership records address. The letter was not returned by the United States Postal Service as undeliverable or for any other reason.

13. By letter dated June 25, 1999 to Respondent, Ms. Dineros informed Respondent that the Probation Unit had not received his quarterly reports due by January 10, 1999 and April 10, 1999, respectively.

14. On or about June 25, 1999, Ms. Dineros's June 25, 1999 letter was mailed to Respondent via the United States Postal Service, first class postage prepaid, in a sealed envelope addressed to Respondent at his official State Bar membership records address. The letter was not returned by the United States Postal Service as undeliverable or for any other reason.

15. By letter dated October 21, 1999 to Respondent, State Bar Paralegal Monique Miller informed Respondent that a motion to revoke probation would be filed as a result of his failure to file with the Probation Unit his quarterly reports and his final report, and as a result of his failure to attend Ethics School and complete at least four hours of MCLE courses by October 8, 1999.

16. On or about October 21, 1999, Ms. Miller's letter was mailed to Respondent via the United States Postal Service, first class postage prepaid, in a sealed envelope addressed to Respondent at his official State Bar membership records address. The letter was not returned by the United States Postal Service as undeliverable or for any other reason.

17. On or about November 1, 1999, pursuant to an order filed by the Review Department of the State Bar Court, Respondent was suspended from the practice of law in California for failure to take and pass the MPRE by October 8, 1999, as ordered by the Supreme Court. On or about November 8, 1999, pursuant to Respondent's motion, the Review Department terminated the suspension and extended the time for Respondent to take and pass the MPRE until the release of the results of the March 2000 examination. On or about November 12, 1999, Respondent took and passed the MPRE.

COUNT ONE

Case No. 00-O-10746

Business and Professions Code, section 6068(k)

[Failure to Comply With Conditions of Probation - Quarterly Reports and Final Report]

18. Respondent wilfully violated Business and Professions Code, section 6068(k), by failing to comply with all conditions attached to any disciplinary probation, as follows:

19. Paragraphs 2 through 17 are incorporated by reference.

20. Respondent's first quarterly report was due by January 10, 1999. On or about October 26, 1999, over 10 months late, Respondent filed his first quarterly report with the Probation Unit. In that report, Respondent stated that he had complied with all provisions of the State Bar Act and Rules of Professional Conduct since the effective date of the Supreme Court Order. Respondent signed the report under penalty of perjury.

21. On or about October 27, 1999, Respondent filed with the Probation Unit his two quarterly reports due by April 10, 1999 and July 10, 1999, respectively, and his final report due by October 8, 1999. In each of those reports, Respondent stated that he had complied with all provisions of the State Bar Act and Rules of Professional Conduct since the effective date of the Supreme Court Order. Respondent signed each report under penalty of perjury.

CONCLUSIONS OF LAW

22. By failing to timely file with the Probation Unit his quarterly reports due by January 10, 1999, April 10, 1999, and July 10, 1999, respectively, and his final report due by October 8, 1999, respondent failed to comply with the terms and conditions of his probation.

23. By the foregoing conduct, Respondent wilfully violated Business and Professions Code, section 6068(k).

COUNT TWO

Case No. 00-O-10746

Business and Professions Code, section 6068(k)

[Failure to Comply With Conditions of Probation - Ethics School]

24. Respondent wilfully violated Business and Professions Code, section 6068(k), by failing to comply with all conditions attached to any disciplinary probation, as follows:

25. Paragraphs 2 through 17 are incorporated by reference.

26. As a condition of probation, Respondent was required to attend State Bar Ethics School and pass the test given at the end of such session, within one year of the effective date of the Supreme Court Order, or by October 8, 1999.

27. On or about November 19, 1999, six weeks late, Respondent attended Ethics School and passed the test given at the end of such session.

CONCLUSIONS OF LAW

28. By failing to timely attend Ethics School, Respondent failed to comply with the terms and conditions of his probation.

29. By the foregoing conduct, Respondent wilfully violated Business and Professions Code, section 6068(k).

COUNT THREE

Case No. 00-O-10746

Business and Professions Code, section 6068(k)

[Failure to Comply With Conditions of Probation - MCLE Courses]

30. Respondent wilfully violated Business and Professions Code, section 6068(k), by failing to comply with all conditions attached to any disciplinary probation, as follows:

31. Paragraphs 2 through 17 are incorporated by reference.

32. As a condition of probation, Respondent was required to attend at least four hours of MCLE approved courses in law office management, attorney/client relations, and/or general legal ethics ("MCLE courses") and provide satisfactory documentary evidence of his completion of said MCLE courses to the Probation Unit, within one year of the effective date of the Supreme Court order, or by October 8, 1999.

33. Respondent failed to attend at least four hours of MCLE courses and provide satisfactory documentary evidence of his completion of said courses to the Probation Unit within one year of the effective date of the Supreme Court order, or to date.

CONCLUSIONS OF LAW

34. By failing to timely complete at least four hours of MCLE courses and provide satisfactory documentary evidence of his completion of said courses to the Probation Unit, within one year of the effective date of the Supreme Court Order, Respondent failed to comply with the terms and conditions of his probation.

35. By the foregoing conduct, Respondent wilfully violated Business and Professions Code, section 6068(k).

FACTS
Case No. 00-O-14654

JURISDICTION

36. MARK MITCHELL GEYER ("Respondent") was admitted to the practice of law in the State of California on June 27, 1975, was a member at all times pertinent to these charges, and is currently a member of the State Bar of California.

COUNT ONE

Case No. 00-O-14654

Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

37. Respondent wilfully violated Rules of Professional Conduct, rule 3-110(A), by repeatedly failing to perform legal services with competence, as follows:

38. In or about December 1998, Respondent was employed by Cullen Houghtaling (Houghtaling") to represent him on a contingency fee basis in a breach of contract action against Shattuck Productions ("Shattuck"), to attempt to recover over \$10,000.00 from Shattuck (the "Shattuck matter").

39. On or about December 18, 1998, Respondent was employed to represent Houghtaling's wife, Josephine Houghtaling (" J. Houghtaling") on a contingency fee basis in a personal injury matter pertaining to an accident that occurred on December 11, 1998 (the "personal injury matter"). On or about December 23, 1998, Respondent, Houghtaling and J. Houghtaling entered into a written fee agreement in the personal injury matter.

40. In the Shattuck matter, Respondent drafted a form civil complaint. Thereafter, Respondent did not file the civil complaint and took no further action in the Shattuck matter.

41. In the personal injury matter, Respondent performed no legal services. As a result, the Houghtalings lost their right to pursue a personal injury lawsuit because the limitations period for filing such an action expired.

CONCLUSIONS OF LAW

42. By failing to perform the services for which he was employed in the Shattuck matter and in the personal injury matter, Respondent repeatedly failed to perform legal services with competence.

COUNT TWO

Case No. 00-O-14654

Business and Professions Code, section 6068(m)
[Failure to Respond to Client Inquiries]

43. Respondent wilfully violated Business and Professions Code, section 6068(m), by failing to respond promptly to reasonable status inquiries of a client in a matter in which Respondent had agreed to provide legal services, as follows:

44. Paragraphs 38 through 41 are incorporated by reference.

45. From in or about January 1999 to in or about May 2000, Houghtaling called Respondent approximately 12 to 15 times and left messages requesting that Respondent call him regarding the status of the Shattuck matter and the personal injury matter. Respondent did not return Houghtaling's calls.

46. From in or about January 1999 to in or about May 2000, on a few occasions, Respondent personally answered the telephone when Houghtaling called. During those calls, Respondent informed Houghtaling that he was working on both the Shattuck matter and the personal injury matter, when in fact, Respondent performed no work on the personal injury matter and performed no work on the Shattuck matter after drafting the civil complaint.

CONCLUSIONS OF LAW

47. By not responding to Houghtaling's calls and/or not providing accurate information when he spoke to Houghtaling, Respondent failed to respond promptly to reasonable status inquiries of a client in a matter in which Respondent had agreed to provide legal services.

[Counts Three, Four and Five Dismissed (See above)]

COUNT SIX

Case No. 00-O-14654

Rules of Professional Conduct, rule 3-700(D)(1)

[Failure to Release File]

48. Respondent wilfully violated Rules of Professional Conduct, rule 3-700(D)(1), by failing to release promptly, upon termination of employment, to the client, at the request of the client, all the client papers and property, as follows:

49. Paragraphs 38 through 41, 45 and 46 are incorporated by reference.

50. On or about May 16, 2000, Houghtaling wrote to Respondent discharging him as his attorney on both the Shattuck matter and the personal injury matter and requesting that Respondent provide to him the case files on both of these matters. Respondent received Houghtaling's letter but did not respond to Houghtaling.

51. In or about January 2001, after approximately an eight month delay, Respondent provided the Houghtalings' files to their new counsel, Dennis Damiano.

CONCLUSIONS OF LAW

52. By failing to promptly provide the Houghtalings' files to the Houghtalings or their new counsel, at the Houghtalings' request after being discharged as their attorney, Respondent failed to release promptly, upon termination of employment, to the client, at the request of the client, all the client papers and property.

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COUNT SEVEN

Case No. 00-O-14654

Business and Professions Code, section 6002.1
[Failure to Report Change of Address]

53. Respondent wilfully violated Business and Professions Code, section 6002.1, by failing to timely report his change of address to the Membership Records office of the State Bar, as follows:

54. From January 16, 1996 to April 23, 2002, Respondent's membership records address with the State Bar was as follows: 16027 Ventura Blvd. #600, Encino, CA 91436-2728. In December 1998, Respondent moved his office to 16027 Ventura Blvd. #205, Encino, CA 91436, but did not report that change of address to the Membership Records office of the State Bar until April 24, 2002, over three years later.

CONCLUSIONS OF LAW

55. By failing to comply with the requirement that he maintain a current office address and report any change of address within 30 days of such change, Respondent failed to timely report his change of address to the Membership Records office of the State Bar.

FACTS

Case No. 01-O-01709

JURISDICTION

56. MARK MITCHELL GEYER ("Respondent") was admitted to the practice of law in the State of California on June 27, 1975, was a member at all times pertinent to these charges, and is currently a member of the State Bar of California.

COUNT ONE

Case No. 01-O-01709

Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

57. Respondent wilfully violated Rules of Professional Conduct, rule 3-110(A), by repeatedly failing to perform legal services with competence, as follows:

58. On or about January 13, 1998, Respondent met with and was employed by Savvas Pakkidis ("Pakkidis") to file a civil action on behalf of Pakkidis in connection with his prior purchase of an apartment building (the "Property") from Robles, Inc. ("Robles").

59. On or about January 13, 1998, Pakkidis paid Respondent advanced attorneys fees in the amount of \$2,500. On or about January 13, 1998, Pakkidis also gave Respondent a check payable to the court for the \$192 filing fee. The \$192 check was never negotiated by Respondent or returned by Respondent to Pakkidis.

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60. On or about January 13, 1998, Pakkidis also gave Respondent original escrow documents pertaining to his purchase of the Property and Respondent promised to copy and return the documents to Pakkidis within a few days. On or about January 13, 1998, Respondent also told Pakkidis that he would be filing the civil complaint against Robles within a few weeks.

61. Subsequently, Respondent failed to file the complaint on behalf of Pakkidis, failed to perform any other work on behalf of Pakkidis and failed to promptly return the original escrow documents to Pakkidis.

62. From on or about January 13, 1998 through in or about June 1998, Pakkidis repeatedly called Respondent and left messages requesting Respondent to call him regarding the status of his case, but Respondent failed to return his calls. On the three occasions that Respondent spoke to Pakkidis, during the period from on or about January 13, 1998 through in or about June 1998, Respondent informed Pakkidis that he was working on his case and promised to file the complaint soon.

63. By letter dated on or about July 15, 1998 to Respondent, Pakkidis inquired about the status of his case, asked when the complaint would be filed with the court and requested that Respondent return his original documents.

64. Respondent received the letter. However, Respondent failed to respond to Pakkidis's letter, failed to file the complaint or perform any other services on his behalf and failed to return Pakkidis's original documents.

65. In or about May 2000, Pakkidis discussed his case with attorney Robert B. Corsun ("Corsun") and asked Corsun to assist him in obtaining from Respondent his original documents and a refund of the \$2,500 advanced fees paid to Respondent. In or about May 2000, Corsun called Respondent to request Pakkidis's file and a refund of unearned fees.

66. On or about May 26, 2000, after receiving Corsun's letter, Respondent sent Pakkidis's file to Corsun, but failed to refund the \$2,500 advanced fees or any portion thereof.

67. By letter sent to Respondent on or about May 30, 2000, Corsun acknowledged receipt of Pakkidis's file and asked Respondent to contact him. Although Respondent received the letter, he failed to respond and failed to refund the \$2,500 advanced fees or any portion thereof.

68. Respondent failed to file the lawsuit on behalf of Pakkidis or perform any legal services on his behalf. To date, Respondent has failed to refund the \$2,500 in advanced fees paid to him by Pakkidis or any portion thereof.

CONCLUSIONS OF LAW

69. By failing to file a lawsuit on Pakkidis's behalf as promised, failing to perform any of the services for which he was employed, failing to respond to Pakkidis's phone calls and his letter dated on or about July 15, 1998, and failing to promptly return Pakkidis's original documents and his file, Respondent repeatedly failed to perform legal services with competence.

COUNT TWO

Case No. 01-O-01709

Business and Professions Code, section 6068(m)

[Failure to Respond to Client Inquiries]

70. Respondent wilfully violated Business and Professions Code, section 6068(m), by failing to respond promptly to reasonable status inquiries of a client, as follows:

71. The allegations of paragraphs 58 through 68 are incorporated by reference.

CONCLUSIONS OF LAW

72. By failing to respond to Pakkidis's calls and letter, Respondent failed to respond to reasonable status inquiries of a client in a matter in which Respondent had agreed to provide legal services.

[Count Three Dismissed. (See above)]

COUNT FOUR

Case No. 01-O-01709

Rules of Professional Conduct, rule 3-700(D)(1)

[Failure to Release File]

73. Respondent wilfully violated Rules of Professional Conduct, rule 3-700(D)(1), by failing to release promptly, upon termination of employment, to the client, at the request of the client, all the client papers and property, as follows:

74. Paragraphs 58 through 68 are incorporated by reference.

CONCLUSIONS OF LAW

75. By failing to promptly return Pakkidis's original documents and client file, Respondent failed to promptly release to his client, upon his client's request, all the client papers and property.

COUNT FIVE

Case No. 01-O-01709

Rules of Professional Conduct, rule 3-700(D)(2)

[Failure to Refund Unearned Fees]

76. Respondent wilfully violated Rules of Professional Conduct, rule 3-700(D)(2), by failing to refund promptly any part of a fee paid in advance that has not been earned, as follows:

77. Paragraphs 58 through 68 are incorporated by reference.

78. Since Respondent failed to file a complaint on Pakkidis's behalf and failed to perform any of the services for which he was employed by Pakkidis, Respondent did not earn any of the advanced fees paid to him by Pakkidis.

79. On September 9, 2002, Respondent returned \$1,000 to Pakkidis. On November 19, 2002, Respondent returned the remaining \$1,500 owed to Pakkidis.

CONCLUSIONS OF LAW

80. By failing to refund all of the \$2,500 in advanced fees paid to him by Pakkidis until November 19, 2002, Respondent failed to promptly refund unearned fees to his client.

FACTS

Case No. 02-O-15397

JURISDICTION

81. MARK MITCHELL GEYER ("Respondent") was admitted to the practice of law in the State of California on June 27, 1975, was a member at all times pertinent to these charges, and is currently a member of the State Bar of California.

COUNT ONE

Case No. 02-O-15397

Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

82. Respondent wilfully violated Rules of Professional Conduct, rule 3-110(A), by repeatedly failing to perform legal services with competence, as follows:

83. In or about November 2000, Respondent was employed by Marty Wasserman ("Wasserman") to represent her on a contingency fee basis in a slip and fall accident claim which occurred on November 18, 2000. Respondent and Wasserman entered into a written agreement regarding this representation on or about November 19, 2000.

84. On or about June 26, 2001,, Respondent filed a civil complaint in the Wasserman matter alleging general negligence and premises liability claims and demanding damages for personal injury on behalf of Wasserman in the sum of \$300,000.00

85. Respondent failed to file proof of service on all defendants and the civil court issued an Order to Show Cause ("OSC") ordering Respondent to appear in court on October 18, 2001 for this failure. A Stanley Landes appeared for Respondent at the October 18, 2001 OSC, proof of service was file for one but not all defendants, and Landes informed the court that all defendants had been served. The court ordered Respondent appear at a further OSC on November 27, 2001 and ordered proof of service for the remaining defendants be filed by November 27, 2001.

86. Respondent failed to appear at the November 27, 2001 OSC and he failed to file proof of service on the remaining defendants as ordered by the court. The court set an OSC re dismissal on December 13, 2001.

87. Respondent failed to appear at the December 13, 2001 OSC and he failed to file proof of service on the remaining defendants. The court dismissed the Wasserman action.

88. Thereafter, Respondent failed to file a motion to set aside the dismissal or to file an opposition to the dismissal.

CONCLUSIONS OF LAW

89. By failing to file proof of service on all defendants in the Wasserman action, by failing to appear at the Order to Show Cause hearings set by the court, by failing to file an opposition to dismissal, and by failing to file a motion to set aside the dismissal, Respondent failed to perform the services for which he was employed by Wasserman and he repeatedly failed to perform legal services with competence.

COUNT TWO

Case No. 02-O-15397

Business and Professions Code, section 6068(m)

[Failure to Respond to Client Inquiries]

90. Respondent wilfully violated Business and Professions Code, section 6068(m), by failing to respond promptly to reasonable status inquiries of a client in a matter in which Respondent had agreed to provide legal services, as follows:

91. Paragraphs 83 through 88 are incorporated by reference.

92. From in or about July 2001 to in or about July 2002, Wasserman called Respondent numerous times and left messages requesting that Respondent call her regarding the status of her legal matter. Respondent did not return Wasserman's calls.

93. Respondent failed to inform Wasserman that her action had been dismissed.

CONCLUSIONS OF LAW

94. By not responding to Wasserman's calls and by not informing Wasserman that her action had been dismissed, Respondent failed to respond promptly to reasonable status inquiries of a client and he failed to inform his client of significant developments in a matter in which Respondent had agreed to provide legal services.

COUNT THREE

Case No. 02-O-15397

Rules of Professional Conduct, rule 3-700(D)(1)

[Failure to Release File]

95. Respondent wilfully violated Rules of Professional Conduct, rule 3-700(D)(1), by failing to release promptly, upon termination of employment, to the client, at the request of the client, all the client papers and property, as follows:

96. Paragraphs 83 through 88, 92 and 93 are incorporated by reference.

97. On or about July 9, 2002, Wasserman wrote to Respondent discharging him as her attorney and requesting Respondent provide her new attorney her case files. On July 10, 2002, Wasserman's new attorney wrote Respondent requesting Wasserman's file. On July 30, 2002, Wasserman's new attorney again wrote Respondent requesting Wasserman's file. Respondent received these letters but did not return Wasserman file to her or to her new attorney.

CONCLUSIONS OF LAW

98. By failing to promptly provide the Wasserman files to the Wasserman or to her new attorney, at Wasserman's request after being discharged as their attorney, Respondent failed to release promptly, upon termination of employment, to the client, at the request of the client, all the client papers and property.

ADDITIONAL PRIOR DISCIPLINE:

Second prior Discipline

- (a) State Bar Court Case: 92-O-10056/93-H-11185 (cons.)
- (b) Date prior discipline effective: November 30, 1993
- (c) Rules of Professional Conduct/State Bar Action violations: rule 1-110 and former rule 3-310(D)
- (d) Degree of prior discipline: Public reproof (with conditions for two years).

Third prior Discipline

- (a) State Bar Court Case: 90-C-13120
- (b) Date prior discipline effective: January 21, 1992
- (c) Rules of Professional Conduct/State Bar Action violations: 6068(a) and 6103 (conviction of two counts of violating Title 26, U. S. Code Section 7203 (willfully and knowingly failing to withhold and pay to IRS all required deductions of two employees))
- (d) Degree of prior discipline: private reproof

HARM: Respondent harmed his clients, the Houghtalings, by causing them to lose their right to pursue two matters and by delaying eight months before turning over their files to new counsel. Respondent also harmed his client, Pakkidis, by delaying the return of \$2,500 in unearned fees.

ADDITIONAL MITIGATING CIRCUMSTANCES:

Lawyer Assistance Program participation:

Respondent signed an agreement to be evaluated through the State Bar's Lawyer Assistance Program (LAP) on September 25, 2002. Respondent complied with the LAP's conditions and requests for evaluation. At the conclusion of the LAP evaluation, Respondent met with the LAP's Evaluation Committee and then entered into a long-term participation agreement with the LAP on December 20, 2002.

Respondent enters into this stipulation as a condition of his/her participation in the Pilot Program. Respondent understands that he/she must abide by all terms and conditions of Respondent's Pilot Program Contract.

If the Respondent is not accepted into the Pilot Program or does not sign the Pilot Program contract, this Stipulation will be rejected and will not be binding on Respondent or the State Bar.

If the Respondent is accepted into the Pilot Program, upon Respondent's successful completion of or termination from the Program, this Stipulation will be filed and the specified level of discipline for successful completion of or termination from the Program as set forth in the State Bar Court's Statement Re: Discipline shall be imposed or recommended to the Supreme Court.

9/8/03
Date


Respondent's Signature

Mark M. Geyer
Print Name

9/8/03
Date


Respondent's Counsel Signature

Edward O. Lear
Print Name

9/8/03
Date


Deputy Trial Counsel's Signature

Charles A. Murray
Print Name

ORDER

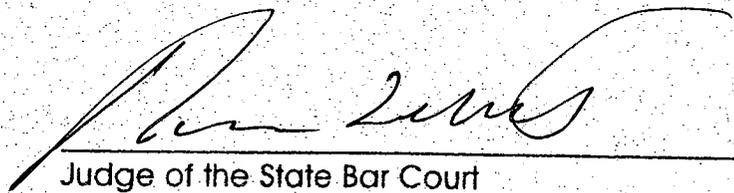
Finding this stipulation to be fair to the parties, IT IS ORDERED that the requested dismissal of counts/charges, if any, is GRANTED without prejudice, and:

- The stipulation as to facts and conclusions of law is APPROVED.
- The stipulation as to facts and conclusions of law is APPROVED AS MODIFIED as set forth below.

The parties are bound by the stipulation as approved unless: 1) a motion to withdraw or modify the stipulation, filed within 15 days after service of this order, is granted; 2) this court modifies or further modifies the approved stipulation; or 3) Respondent is not accepted for participation in the Pilot Program or does not sign the Pilot Program Contract. (See rules 135(b) and 802(b), Rules of Procedure.)

The effective date of the disposition is the effective date of the Supreme Court order herein, normally 30 days after the file date of the Supreme Court Order. (See rule 953(a), California Rules of Court.)

NOV. 20, 2003
Date



Judge of the State Bar Court

CERTIFICATE OF SERVICE
[Rule 62(b), Rules Proc.; Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on November 21, 2003, I deposited a true copy of the following document(s):

**DECISION RE ALTERNATIVE RECOMMENDATIONS FOR DEGREE OF
DISCIPLINE**

STIPULATION RE FACTS AND CONCLUSIONS OF LAW

**CONTRACT AND WAIVER FOR PARTICIPATION IN THE STATE BAR
COURT'S PILOT PROGRAM FOR RESPONDENTS WITH SUBSTANCE ABUSE
OR MENTAL HEALTH ISSUES**

in a sealed envelope for collection and mailing on that date as follows:

by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

**EDWARD LEAR, ESQ.
CENTURY LAW GROUP
5200 W CENTURY BLVD #940
LOS ANGELES CA 90045**

by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

CHARLES MURRAY, ESQ., Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on **November 21, 2003**.



Rose M. Luthi
Case Administrator
State Bar Court

PUBLIC MATTER

1 THE STATE BAR OF CALIFORNIA
2 OFFICE OF THE CHIEF TRIAL COUNSEL
3 ENFORCEMENT
4 SCOTT J. DREXEL, no. 65670
5 CHIEF TRIAL COUNSEL,
6 BROOKE A. SCHAFER, bar no.194824
7 DEPUTY TRIAL COUNSEL
8 1149 South Hill Street
9 Los Angeles, California 90015-2299
10 Telephone: (213) 765-1000

FILED
FILED
OCT 31 2007
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

~~FILED~~

APR 13 2006

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

THE STATE BAR COURT

ALTERNATIVE DISCIPLINE PROGRAM - LOS ANGELES

10 In the Matter of) Case No. 00-O-10746-RMT et al.
11)
12 MARK M. GEYER,) PARTIES' FIRST ADDENDUM
13 No. 64122) TO STIPULATION RE: FACTS AND
14) CONCLUSIONS OF LAW
15 A Member of the State Bar)
_____)

16 The State Bar of California, Office of Chief Trial Counsel, through Deputy Trial
17 Counsel Brooke Schafer, and Respondent, Mark Geyer, with advice and assistance of
18 counsel, submit this Addendum to the Stipulation re: Facts and Conclusions of Law
19 previously lodged in September 2003. This Addendum relates solely to case nos. 03-O-
20 5008; 04-O-12746 and 04-O-12467.

21 **I. INCORPORATION OF PRIOR STIPULATION**

22 This addendum is intended to supplement the Stipulation re: Facts and
23 Conclusions of Law in case nos. 00-O-10746 et al., which the parties lodged with this
24 Court in September 2003 (the "Prior Stipulation"). The Prior Stipulation is incorporated
25 as if fully set forth herein. Respondent is currently a participant in the court's Alternative
26 Discipline Program ("ADP").

27 Attached hereto is the parties' stipulation as to facts and conclusions of law in case
28

1 nos. 03-O-5008; 04-O-12746 and 04-O-12467, involving additional misconduct. Any
2 outstanding investigations pending at the time this addendum was entered into were
3 disclosed but are expressly not part of this addendum; they may be included in a
4 subsequent addendum.

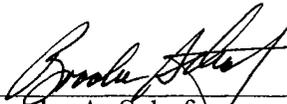
5 **II. THE STATE BAR'S DISCIPLINE RECOMMENDATION SHALL BE**
6 **REVISED UPWARD**

7 The discipline recommended by the State Bar shall be revised upward as a result
8 of the misconduct described herein. The State Bar shall forthwith submit to the court its
9 recommendations for additional discipline to be imposed regardless of Respondent's
10 outcome in ADP.

11 Respondent understands that whether the court imposes additional discipline or not
12 for the misconduct herein, an additional restitution obligation will be imposed as a
13 condition of successful completion of ADP. That additional restitution obligation is
14 described in the attachment hereto.

15 Respectfully submitted,

16
17 Date: April 13, 2006



Brooke A. Schafer
Deputy Trial Counsel
Office of Chief Trial Counsel

18
19
20
21 Date: April 13, 2006



Mark M. Geyer
Respondent

22
23
24 Date: April 13, 2006



Edward O. Lear
Counsel for Respondent

ADDENDUM TO STIPULATED FACTS and CONCLUSIONS OF LAW
STATE BAR ALTERNATIVE DISCIPLINE PROGRAM

IN THE MATTER OF: **MARK M. GEYER**, bar no. 64122

CASE NUMBERS: 03-O-5008; 04-O-12746; 04-O-12467

Prior Stipulation Incorporated Herein

This addendum is intended to supplement the Stipulation re: Facts and Conclusions of Law in case nos. 00-O-10746 et al., which the parties lodged with the Alternative Discipline Program ("ADP") Court in or about September 2003 (the "Prior Stipulation"). The Prior Stipulation is also incorporated as if fully set forth herein.

The State Bar has informed Respondent that it may recommend higher levels of discipline as a result of the additional misconduct described herein.

Further, Respondent understands that regardless of the court's decision as to additional discipline, additional restitution obligations will likely be imposed. These restitution amounts are described below.

Case no. 03-O-5008 (Reichelt matter)

1. In September 1998 Lawrence Reichelt ("Reichelt") hired Respondent to represent him in a personal injury matter following an auto accident. Respondent agreed to handle the case on a contingency basis.

2. On August 19, 1999, Respondent sued the other driver in Los Angeles Superior Court, on Reichelt's behalf.

3. Respondent was unable to serve the defendant, however, and the court issued an order calling for an OSC re: dismissal for failure to file proof of service. The OSC was set for January 3, 2000. Respondent appeared and asked the court for more time in which to perfect service. The court continued the OSC re: dismissal to March 3, 2000.

4. By March 3, 2000, no proof of service had been filed. Respondent did not appear at the OSC re: dismissal held that day. As a result, the court dismissed Reichelt's lawsuit. Respondent never informed Reichert that his lawsuit had been dismissed.

5. As the months went by Reichelt would inquire periodically as to the status of his

lawsuit. Over time Respondent offered inconsistent responses, although he always assured Reichelt that his case was proceeding. Not satisfied, Reichelt inspected the court file in September 2001, and discovered that his case had been dismissed in March 2000. Reichelt immediately confronted Respondent, who promised his client he would file motions to re-open the case.

6. Thereafter, despite Respondent's assurances that he would move to re-open Reichelt's lawsuit, he failed to do so. It was not until February 2003 that Respondent informed Reichelt that he did not file a motion to reinstate the case.

7. Reichert filed a malpractice action against Respondent in June 2003, alleging negligence and fraud with respect to the handling of Reichert's lawsuit. Respondent defaulted, and a later prove-up hearing fixed monetary damages in favor of Reichert.

8. Respondent filed for Chapter 7 bankruptcy protection in December 2004 (US Bankruptcy Court no. 04-17950, Central District of California). Respondent listed Reichert as a creditor in the amount of \$50,000.00, and his debt was discharged in bankruptcy. To date no money has been paid to Reichert.

Conclusion of Law no. 01-O-02690

– By failing to appear at the March 3, 2000, OSC re dismissal and then by failing to take any steps to set aside the dismissal, Respondent recklessly failed to perform legal services with competence in wilful violation of Rules of Professional Conduct, rule 3-110(A).

– By failing to inform Reichert that his lawsuit had been dismissed in March 2000, or that Respondent had not taken any steps to move to reinstate the case despite making assurances that he would do so, Respondent failed to notify his client of significant developments in a matter to which the attorney the attorney has agreed to provide legal services, in wilful violation of Business and Professions Code section 6068(m).

Case no. 04-O-12746 (Zavari)

9. In January 2002, Yunus Zavari hired Respondent to defend him in a breach of contract matter that had already been filed in Los Angeles Superior Court. Zavari paid Respondent \$750.00 in advance legal fees.

10. In October 2002, as no answer had been filed, a default judgment was filed against Zavari in the lawsuit.

11. Respondent performed no work of any value on Zavari's matter prior to the default

being taken in the lawsuit.

12. In February 2003, Respondent told Zavari that he had filed a motion to vacate the default, and that a court date had been set. In reality, however, Respondent had not filed a motion to vacate and there was no such court date.

13. At no time did Respondent perform any work of value for Zavari, and he effectively abandoned his client. Respondent owes Zavari a full refund of the \$750.00.

Conclusions of Law – case 04-O-12746

– By failing to perform any legal work on the defense of the lawsuit against Zavari which resulted in a default, and by failing to take steps to set aside the default, Respondent recklessly failed to perform legal services with competence, in wilful violation of Rules of Professional Conduct, rule 3-110(A).

– By misrepresenting to Zavari that he had filed a motion to vacate the default and that a court date to hear the motion had been set, when he knew that in fact neither were true, Respondent wilfully violated Business and Professions Code section 6106 by committing moral turpitude and dishonesty.

Case no. 04-O-12467 (Pavlo)

14. In March 2003 Barbara Pavlo hired Respondent to represent her in a divorce proceeding that had already been filed in Los Angeles Superior Court. At the time of hire Pavlo paid Respondent \$5000.00 in advance legal fees.

15. On June 17, 2003, opposing counsel in the divorce action served Respondent with a Motion Compelling [Pavlo] to Respond to Discovery and Attorneys Fees (“Motion”). The Motion indicated a hearing date of July 28, 2003, on this issue. Respondent did not inform Pavlo of the Motion or of the hearing date.

16. On July 11, 2003, Pavlo terminated Respondent’s services and hired a new attorney, Stephen Shapiro. Shapiro the same date sent a letter to Respondent informing him of his representation and asking for an accounting of the work done on Pavlo’s case, and for a refund of unearned fees, on behalf of his client Pavlo.

17. Thereafter Respondent failed to notify Pavlo or Shapiro of the July 28, 2003, hearing on the Motion, and he also failed to provide the requested accounting.

18. A hearing on the Motion was held on July 28, 2003. The court imposed sanctions in

the amount of \$1000.00 on Pavlo for failing to respond to discovery.

19. On August 18, 2003, Shapiro again asked for an accounting and refund of Pavlo's fees. At no time did Respondent provide either.

20. Respondent provided no work of any value to Pavlo. As such Pavlo is entitled to a full refund of \$5000.00.

21. Pavlo complained to the State Bar about the poor representation provided by Respondent. In June 2004, and approximately a month later in July 2004, a State Bar investigator wrote to Respondent asking for him to respond in writing to specific allegations of misconduct in the Pavlo matter. Although he received these requests for information Respondent failed to respond to either letter in any substantive way.

Conclusions of law - 04-O-12467

– By failing to inform his client of the Motion, of the July 28, 2003, hearing on the Motion, or of the \$1000.00 sanction against her, Respondent failed to keep his client informed of a significant event in a matter in which he agreed to provide legal services, in wilful violation of Business and Professions Code section 6068(m).

– By failing to provide an accounting of fees and work performed in the Pavlo case, Respondent failed to render an accounting of all client funds to his client, in wilful violation of Rules of Professional Conduct, rule 4-100(B)(3).

– By failing to refund the \$5000.00 fee despite having earned none of it, Respondent failed to refund an unearned fee, in wilful violation of Rules of Professional Conduct, rule 3-700(D)(2).

– By not providing written responses to State Bar requests for information, Respondent failed to cooperate and participate in a disciplinary investigation in wilful violation of Business and Professions Code section 6068(i).

II. RULE 133 NOTICE OF PENDING PROCEEDINGS

Respondent was notified in writing of any pending investigations not included in this stipulation, pursuant to Rule 133(12), on April 13, 2006.

III. PARTIAL WAIVER OF CONFIDENTIALITY AND RESTITUTION CONDITIONS

Waivers re Confidentiality and Restitution Efforts

The parties agree that it is appropriate, given the intent of the Alternative Discipline Program, that restitution be paid as soon as practicable. Respondent understands and agrees that the State Bar Client Security Fund ("CSF") can, in some cases, pay restitution in these matters, with the Respondent then responsible for reimbursing CSF for any such amounts it has paid. Respondent acknowledges that to the extent CSF has paid only principal amounts he will still be liable for interest payments to the claimants where appropriate. In order that CSF can pay the claimants at an early date, however, it is necessary that Respondent partially waive confidentiality to effectuate those purposes. By entering into this stipulation Respondent makes the following express waivers, pursuant to Rule of Procedure 805.

• Respondent expressly waives any objection to immediate payment by the State Bar's Client Security Fund upon a claim(s) for the principal amounts of restitution as set forth in the Stipulation re: Facts and Conclusions of Law.

• Respondent waives any objections related to the State Bar's (including OCTC, Client Security Fund or State Bar Court) notification to former clients and/or victims of misconduct regarding the amounts due to them under the restitution schedule herein (whether principal or interest), or regarding assistance in obtaining restitution or payment from the Client Security Fund or from Respondent, at any time after Respondent's admission to the Pilot Program. Respondent expressly waives confidentiality for purposes of effectuating this section re: restitution, has reviewed Rule of Procedure, rule 805 and has had opportunity to consult with counsel prior to this waiver(s).

• Respondent waives any objection to the State Bar's (including OCTC, Client Security Fund or State Bar Court) notification to former clients and/or victims of misconduct explained herein regarding fee arbitration or assistance with fee arbitration should any former client wish to pursue it. Respondent expressly waives any defenses and/or objections in such fee arbitration proceeding based on the running of any statute of limitations.

Restitution Schedule

As a condition of his Pilot Program compliance in this matter, Respondent shall pay the following restitution to the following persons (and/or the Client Security Fund, if it has paid) in the following amounts plus 10 percent interest per annum accruing from the dates indicated. To the extent Respondent has paid any restitution prior to the effective date of the order arising from this stipulation he shall be given credit for such payments provided satisfactory proof is shown to the Probation Unit of the State Bar:

1. To Yunus Zavari, \$750.00 plus interest from July 1, 2003.
2. To Barbara Pavlo, \$5000.00 plus interest from January 1, 2004.

/// end of attachment ///

CERTIFICATE OF SERVICE
[Rule 62(b), Rules Proc.; Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court of California. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on March 19, 2008, I deposited a true copy of the following document(s):

**DECISION AND ORDER FILING AND SEALING CERTAIN DOCUMENTS;
PARTIES FIRST ADDENDUM TO STIPULATION RE: FACTS AND
CONCLUSIONS OF LAW; STIPULATION RE FACTS AND CONCLUSIONS
OF LAW**

in a sealed envelope for collection and mailing on that date as follows:

- [X] by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

**EDWARD LEAR
CENTURY LAW GROUP LLP
5200 W CENTURY BLVD #345
LOS ANGELES CA 90045**

- [X] by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

ERIC HSU, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on **March 19, 2008**.



Angela Owens-Carpenter
Case Administrator
State Bar Court